

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

**AARON LARRY BOWMAN**

**VS.**

**OUACHITA PARISH SHERIFF'S  
OFFICE, ET AL.**

**CIVIL ACTION NO:**

**3:20-cv-01372**

**JUDGE TERRY A. DOUGHTY**

**MAGISTRATE JUDGE  
KAREN L. HAYES**

**MOTION FOR EXTENSION OF TIME TO OPPOSE DEFENDANT’S MOTION TO  
DISMISS COMPLAINT (FIRST REQUEST) (UNOPPOSED)**

NOW COMES the Plaintiff, Aaron Larry Bowman, through the Undersigned, who respectfully requests an extension of time to file responsive pleadings in this matter for the following reasons:

1. This tort and civil rights action was filed in Louisiana state court on September 21, 2020.
2. This matter was removed to federal court on October 22, 2020.
3. City of Monroe and Monroe City Police Department Defendants previously filed a Motion to Dismiss for Failure to State a Claim, Lack of Jurisdiction, and a Motion to Stay 12(b) motions on December 2, 2020.
4. Co- Defendants, the University of Louisiana System Board of Supervisors, Deputy Donovan Ginn, and Parish Sheriff Jay Russell, and Louisiana Public Safety & Corrections have likewise filed Rule 12(b) motions to dismiss the suit.
5. At that time, Plaintiff requested an additional extension of time due to his Counsel/the Undersigned's immediate family members being diagnosed with Covid-19. Accordingly, the Undersigned was forced to care for her family during that time.
6. Plaintiff's Motion for Extension of Time was granted and extended to December 24, 2020.
7. Plaintiff and Counsel recently learned that an additional Defendant, Trooper Jacob Brown, with the Louisiana State Police has been arrested and charged with Aggravated Second-Degree Battery and Malfeasance in Office on December 10, 2020. As such, Plaintiff's Petition must be amended and additional time given to respond to the pending 12(b) motions.

8. Plaintiff has confirmed, through opposing counsel, that there is no objection to the requested extension.

WHEREFORE, the premises considered, Plaintiff, Aaron Larry Bowman, requests an extension of time to file responsive pleadings for an additional twenty-one (21) days after the noted deadline of December 24, 2020.

Respectfully submitted,

/s/ Donecia Banks-Miley  
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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion for Extension of Time to Oppose Defendant's Motion has been electronically filed with the Clerk of Court using the CM/ECF filing system. Notice of this filing will be forwarded to all counsel by operation of the Court's electronic filing system.

Monroe, Louisiana, this 24th day of December 2020.

/s/ Donecia Banks-Miley  
Donecia Banks-Miley, #35641

